

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF NEW
HAMPSHIRE, *et al.*,**

Plaintiffs,

v.

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

**JOINT MOTION TO STAY PROCEEDINGS RELATED TO PLAINTIFFS' CLAIMS
AGAINST DEFENDANT LINGO TELECOM, LLC DUE TO SETTLEMENT
NEGOTIATIONS**

Plaintiffs, League of Women Voters of New Hampshire, League of Women Voters of the United States, Nancy Marashio, James Fieseher, and Patricia Gingrich, and Defendant Lingo Telecom, LLC (collectively, the “Parties”) jointly move the Court for entry of a two-week stay on any pending motions related to Plaintiffs’ claims against Lingo Telecom, LLC while the Parties seek a negotiated resolution.

A proposed order is attached.

Dated: February 6, 2025

Respectfully submitted,

/s/ Mark R. Herring

Mark R. Herring* (DC Bar #90013124)
Matthew R. Nicely* (DC Bar #430564)
Caroline L. Wolverton* (DC Bar #496433)
Amanda S. McGinn* (DC Bar #1049085)
Joseph T. DiPiero* (DC Bar #1618536)
Maria Julia Hershey* (DC Bar #90020162)
Sara M. Hanna* (DC Bar #90017864)
AKIN GUMP STRAUSS HAUER & FELD
Robert S. Strauss Tower
2001 K Street, N.W.
Washington, DC 20006-1037

(202) 887-4000
mherring@akingump.com
mnicely@akingump.com
cwolverton@akingump.com
amcginn@akingump.com
jdipiero@akingump.com
mhershey@akingump.com
shanna@akingump.com

Courtney Hostetler* (MA Bar #683307)
John Bonifaz* (MA Bar #562478)
Ben Clements* (MA Bar #555802)
Amira Mattar* (NY Bar #5774450)
FREE SPEECH FOR PEOPLE
48 N. Pleasant St., Suite 304
Amherst, MA 01002
(617) 244-0234
chostetler@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org
amira@freespeechforpeople.org

William C. Saturley (NH Bar #2256)
Nathan R. Fennessy (NH Bar #264672)
Nicholas A. Dube (NH Bar #27464)
PRETIFLAHERTY
57 N Main Street
PO Box 1318
Concord, NH 03301-1318
(603) 410-1500
wsaturley@preti.com
nfennessy@preti.com
ndube@preti.com

Counsel for Plaintiffs
**Admitted Pro Hac Vice*

/s/ Helgi C. Walker

Helgi C. Walker* (DC Bar #454300)
Jacob T. Spencer* (DC Bar #1023550)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, DC 20036
Tel: (202) 955-8500
Fax: (202) 467-0539

hwalker@gibsondunn.com

/s/ Thomas M. Johnson, Jr.

Thomas M. Johnson, Jr.* (DC Bar #976185)
Frank Scaduto* (DC Bar #1020550)
Boyd Garriott* (DC Bar #1617468)
WILEY REIN LLP
2050 M Street NW
Washington, DC 20036
Tel: (202) 719-7000
Fax: (202) 719-7049
tmjohnson@wiley.law

/s/ Michele E. Kenney

Michele E. Kenney (NH Bar #19333)
PIERCE ATWOOD LLP
One New Hampshire Avenue, Suite 350
Portsmouth, NH 03801
(603) 433-6300
mkenney@pierceatwood.com

Counsel for Defendant Lingo Telecom, LLC
**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of February, 2025, a true and correct copy of the above was electronically filed with the Court and served upon the following:

Wayne E. George
Morgan Lewis & Bockius LLP
One Federal St
Boston, MA 02110-4104
Counsel for Defendant Life Corporation
Via ECF System

Steve Kramer
2100 Napoleon Ave.
New Orleans, LA 70115
AND
20 Cloverleaf Drive
New Fairfield, CT 06812
Via US Mail on February 6, 2025

Tom Reid
67 S Main St #2
Concord, NH 03301
Via US Mail on February 6, 2025

A true and correct copy was also transmitted via electronic mail to Steve Kramer at gotvcalls@gmail.com.

Respectfully submitted,

/s/ Mark R. Herring
Counsel for Plaintiffs